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10 Attorneys for Plaintiff GILBERT GUZMAN

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 GILBERT GUZMAN, an individual,

14 Plaintiff,

15 v.

16 SPACE EXPLORATION
17 TECHNOLOGIES CORP., a
18 Delaware Corporation; and DOES 1
19 through 60, inclusive,

20 Defendants.

CASE NO. 2:15-cv-06000-R-RAO

*[Assigned to Courtroom 8 - Honorable
Manuel L. Real, Rozella A. Oliver,
Magistrate]*

**DECLARATION OF MICHAEL G.
JACOB IN SUPPORT OF MOTION
FOR REMAND**

Date: December 21, 2015

Time: 10:00 a.m.

Courtroom: 8

*[Concurrently filed with the Notice of
Motion, and Motion to Remand]*

Complaint filed: March 9, 2015

Removal: August 10, 2015

Trial Date: May 17, 2016

DECLARATION OF MICHAEL G. JACOB, ESQ.

I, Michael G. Jacob, declare as follows:

1. I am an attorney at law licensed to practice in the State of California before this court, and am a named partner in the law firm of Kesluk, Silverstein & Jacob, attorneys of record for Plaintiff herein. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify competently thereto. I submit this declaration in support of Plaintiff's motion for remand.

2. As of today's date, the parties have not formally conducted any federal discovery other than exchanging initial disclosures.

3. A considerable amount of the substantive litigation of this case, including substantial written discovery, has already been propounded and responded to in the state court proceeding. The parties previously requested or responded to the following discovery in the state court proceeding:

Tab No.	Discovery Title	Served By	Date
1	Form Interrogatories-General, Set No. One	Defendant	04/30/15
2	Form Interrogatories-Employment Law, Set No. One	Defendant	04/30/15
3	Special Interrogatories, Set One	Defendant	04/30/15
4	Requests for Production of Documents, Set One	Defendant	04/30/15
5	Requests for Admission, Set No. One	Defendant	04/30/15
6	Form Interrogatories-Employment Law, Set No. One	Plaintiff	05/14/15
7	Form Interrogatories-General, Set No. One	Plaintiff	05/14/15
8	Request for Production of Documents, Set No. One	Plaintiff	05/14/15
9	Subpoena for Production of Records (Chubb Group)	Plaintiff	07/02/15
10	Response to Form Interrogatories-General, Set One	Plaintiff	07/09/15
11	Response to Form Interrogatories-Employment Law, Set One	Plaintiff	07/09/15

1	12	Response to Special Interrogatories, Set One	Plaintiff	07/09/15
2	13	Response to Requests for Admission, Set One	Plaintiff	07/09/15
3	14	Response to Requests for Production of Documents, Set One	Plaintiff	07/09/15
4	15	Response to Form Interrogatories-Employment Law, Set One	Defendant	07/23/15
5	16	Response to Form Interrogatories- General, Set One	Defendant	07/23/15
6	17	Response to Request for Production of Documents, Set One	Defendant	07/23/15

8 4. Aside from this motion for remand, there are no pending motions
9 and/or discovery matters being addressed by the federal court.

10 5. At Defendant's request, Plaintiff has filed a stipulation to continue the
11 trial and all related deadlines.

12 6. This motion is made following the conference of counsel pursuant to
13 L.R. 7-3 which took place on September 21, 2015. The parties also engaged in
14 additional meet and confer efforts thereafter, continuing until on or about
15 November 18, 2015.

16 Executed this 18th day of November 2015.

17 I declare under penalty of perjury under the laws of the United States of
18 America and State of California that the foregoing is true and correct.
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20 /s/ Michael G. Jacob
21 MICHAEL G. JACOB, ESQ.
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